

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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THE EDWARD ANDREWS GROUP INC.,	:	
	:	07 Civ. 4607 (AJP)
Plaintiff,	:	
	:	PLAINTIFF'S
-against-	:	NOTICE OF
	:	MOTION
ADDRESSING SERVICES COMPANY, INC.,	:	<u>IN LIMINE</u>
	:	
Defendant.	:	
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PLEASE TAKE NOTICE that, upon the annexed affidavit of David C. Burger, sworn to on March 6, 2008, and the exhibits attached thereto, and the accompanying memorandum of law, Plaintiff The Edward Andrews Group Inc., by its attorneys, Robinson Brog Leinwand Greene Genovese & Gluck P.C., will move this Court, at the Daniel P. Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for an order in limine, pursuant to Rule 7 of the Federal Rules of Civil Procedure, barring Defendant Addressing Services Company, Inc. from introducing any evidence and argument at the trial of this action in support of: (a) any purported claim that this action is barred, in part or in whole, by the proceedings, judgment and settlement of the judgment in the prior litigation captioned The Edward Andrews Group Inc. v. Addressing Services Company, Inc., 04 Civ. 6731 (S.D.N.Y.); and (b) any purported claim that any unexecuted release is a bar to any recovery by EAG on its breach of contract claim, or that any such release forms any bar to EAG's claim for unjust enrichment, and granting such other and further relief in favor of Plaintiff as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to paragraph 2(F) of the Individual Practices of Magistrate Judge Andrew J. Peck, opposition papers are to be served two weeks after service of the motion, unless a different schedule is ordered by the Court.

Dated: March 6, 2008

**ROBINSON BROG LEINWAND GREENE
GENOVESE & GLUCK P.C.**

By: 

David C. Burger (DB-8666)

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Attorneys for Plaintiff

The Edward Andrews Group Inc.